

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

Docket No. N2012-1

INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS DAVID E. WILLIAMS
(APWU/USPS-T1-39-48)
(February 23, 2012)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness David E. Williams (USPS-T-1). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

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Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T1-39 In the current case, there are several instances where the same gaining site is named for more than one potential losing site. Please explain in general how the AMPs are conducted when there are multiple facilities that could be consolidated into one facility. Please specifically address:

- a) How is available processing time at the gaining facility analyzed with respect to all the potential incoming mail?
- b) Is there one consolidated comparison that compares workhours at all the losing sites to the “after” workhours at the gaining site?
- c) For each of the individual losing site AMPs, how is the net employment impact being calculated?

APWU/USPS-T1-40 Please describe each of the columns on the 24 hour clock tables that are included in most of the AMPs and how those columns are used to judge potential service performance bottlenecks.

- a) The 24 hour clock tables do not routinely appear in the PIRs. Why is a comparison of the 24 hour clock performance in the gaining facility before and after the transition not routinely included in the PIRs?

APWU/USPS-T1-41 If the 24 hour clock table in an AMP shows that second pass DPS is in the green and is therefore finishing on-time most of the time, but the transportation measure in the last column is in the red, well below the target percentages, what sort of operational concerns does that raise?

APWU/USPS-T1-42 If a gaining facility is being evaluated for the potential receipt of mail from multiple “losing” facilities and the gaining facility already has one or more 24 hour clock measures that are substantially below target, does that trigger any special remediation activities at the gaining facility before additional AMPs are approved? If not, how do you determine that there will not be service degradations when additional facilities are consolidated?

APWU/USPS-T1-43 In reference to the analysis that is presented in USPS-LR-N2012-1/47, you state in your response to GCA/USPS-T1-1 that the “analysis performed suggested the savings potential from maintaining some level of overnight service standards, with some relaxation of overnight relationships was not as great as the proposed change.”

- a) Was there a target savings from the network consolidation that determined which service standards scenarios would be considered and which ones would not be considered? If so, what was that dollar value?
- b) Witness Rosenberg has stated that her modeling effort was not an optimization of the network. If a dollar savings goal was not established and there was not a

specific optimization goal, what factors were used to determine how much change in the service standards was acceptable?

- c) What level of overnight service was available for each of the scenarios presented in USPS-LR-N2012-1/47?

APWU/USPS-T1-44 Please refer to USPS-LR-N2012-1/47.

- a) Please confirm that this analysis was conducted using FY2009 workload volumes.
- b) Was a similar analysis ever done using FY2010 workload volumes so that it could be compared to the analysis underlying the proposed plan in this docket?
- c) Please confirm that the baseline scenario shows 6 hours for all activities except for second pass DPS, which was assigned 1.5 hours.
- d) The 6 hour windows for the Outgoing Primary and Incoming Primary operations do not seem to be consistent with the operating plan presented in Witness Neri's testimony at page 13. Is the second pass DPS window, the one that is the bottleneck in most processing plants?
- e) Scenarios 1 and 2 extend the second pass DPS window by 1 and 2 hours respectively. Please confirm that a 1 hour extension of the DPS window reduced the estimated number of plants necessary to process the mail by 95 facilities.
- f) Were these scenarios only focused on letter and flats volumes?
- g) On the facilities worksheet please indicate what determined whether or not a facility had an "X" in the column labeled "include?"
- h) FY2009 would have been before the FSS machines were in widespread operation. How was flats processing evaluated in these scenarios?

APWU/USPS-T1-45 Is there a non-public version of the worksheet that has been filed as Public USPS-LR-N2012-1/47?

APWU/USPS-T1-46 In its February 23, 2012 press kit, the Postal Service states that it has determined that it is feasible to consolidate 183 of the 212 facilities that underwent the AMP process under this initiative.

- a) When will the AMPs for those facilities be provided to the Commission?
- b) What is the AMP determined dollar value of savings estimated for those 183 facilities?
- c) Is the estimate of \$2.1 billion in savings that is presented in the press kit calculated from the AMPs or did that number come from witness Bradley's high level analysis?

APWU/USPS-T1-47 In its February 23, 2012 press kit, the Postal Service states that it has determined that of the 52 facilities for which AMPs were not required, 40 will be consolidated.

- a) What factors were evaluated to reach those decisions?
- b) Have the public comments collected from the February 6, 2012 newspaper advertisements already been evaluated?
- c) If not, how will those comments be evaluated since the press release indicates that the decision has already been made to consolidate those facilities?
- d) What is the dollar value savings that the Postal Service has attached to these facilities and how have those savings numbers been determined?

APWU/USPS-T1-48

- a) Please confirm that destinating mail from the Frederick, MD P&DF was approved to be consolidated into the Baltimore P&DC in August 2011.
- b) Please confirm that originating mail from the Frederick, MD P&DF was consolidated into Suburban Maryland P&DC in July 2010.
- c) What is the current status of the Frederick, MD P&DF? Are any mail processing activities currently taking place there?
- d) Where is the mail (originating and destinating) that was previously processed at the Frederick, MD P&DF actually being processed at this time?
- e) If there have been any changes since the AMPs approved above, please provide the AMP that shows that analysis.